REMARKS

Claims 1-3 and 10-17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable (obvious) over Christen '011 in view of Hornsby '610 and Keller '726.

Claims 4-9 stand rejected under 35 U.S.C. § 103(a) as being unpatentable (obvious) over Christen, Hornsby and Keller and further in view of Hatuse '115.

Applicant respectfully **traverses** these rejections.

Applicant has amended the independent device claim 1 to insert the first "wherein" limitation from dependent claim 4 (and this limitation has been deleted from claim 4), and has amended the method claim 12 so that it also recites a display means comprising "at least two hands".

The Examiner cites Hornsby only for the fact that "games incorporated into wristwatches" are known in the art, a fact which is acknowledged in Applicant's specification at page 1, lines 4-15. Of the remaining three references, only Keller relates to a "game mode". Hatuse merely discloses an electronic timepiece having an analog display and, as alleged by the Examiner, "control keys arranged in registration to at least certain of said hour symbols".

The invention presently being claimed in independent claims 1 and 12 is that, in a first phase of the memory game (see claim 12), the electronic timepiece displays the indications that it has generated via at least one of said hands provided for displaying the time.

Applicant respectfully submits that the combination of Christen, Hornsby, Keller and Hatuse does not teach, or even suggest, all of the limitations of independent claims 1 and 12, particularly

> ... a game mode, wherein said electronic unit [...] temporarily displays one or more visual indications via at least one of said hands before the user provides answers attempting to reproduce said indications. These "hands" are defined in the claims as the hands provided for displaying the time.

Applicant acknowledges that Christen discloses that an electronic watch may point the hands of a time display onto a symbol that the user has just selected (see col. 6, lines 2-27, and Figs. 4D, 4F and 4H), **but only** to show a confirmation of the user's selection made on the adjacent key (called a "detector"). This is **not** a display mode for "visual indications generated" by the "electronic unit" of the watch. Furthermore, Christen does **not even mention or recognize Applicant's claimed** "game mode" and, thus, **cannot** suggest anything in the context of display of random values in such a "game mode".

Keller relates to a "game mode" and includes a step of display of random values to be repeated by the user. As described in col. 2, lines 51-54, the five-digit random number is displayed on the liquid crystal display (LCD 24) of the game device which has **no hand** and, moreover, **no combination with a watch** is even remotely suggested in this reference.

In view of the above-noted deficiencies in the applied references, especially Christen and Keller, Applicant respectfully submits it would not have been *prima facie* obvious to combine the teachings of Christen, Hornsby, Keller and Hatuse to reach the subject matter now defined in independent claims 1 and 12 and their respective dependent claims, and, furthermore, even if, for

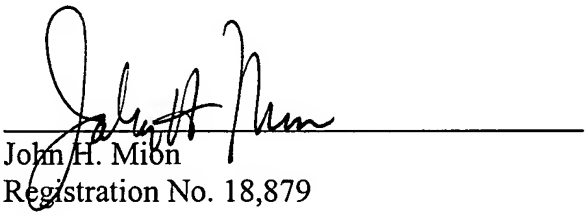
some unknown reason, a person were to combine the teachings of these references, there would not be produced the subject matter of any of the claims 1-17, or subject matter which would have rendered obvious claims 1-17.

Therefore, Applicant respectfully requests the Examiner to reconsider and withdraw the two rejections under 35 U.S.C. § 103(a), and to find the application to be in condition for allowance with all of claims 1-17; however, if for any reason the Examiner feels that the application is not now in condition for allowance, the Examiner is respectfully requested to **call the undersigned attorney** to discuss any unresolved issues and to expedite the disposition of the application.

Applicant files concurrently herewith a Petition (with fee) for an Extension of Time of One Month. Applicant hereby petitions for any extension of time which may be required to maintain the pendency of this application, and any required fee for such extension is to be charged to Deposit Account No. 19-4880. The Commissioner is also authorized to charge any

additional fees under 37 C.F.R. § 1.16 and/or § 1.17 necessary to keep this application pending in the Patent and Trademark Office or credit any overpayment to said Deposit Account No. 19-4880.

Respectfully submitted,



John H. Mion
Registration No. 18,879

SUGHRUE MION, PLLC
2100 Pennsylvania Avenue, N.W.
Washington, D.C. 20037-3213
(202) 663-7901

WASHINGTON OFFICE
23373
CUSTOMER NUMBER

Date: August 31, 2005